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FILED
 Clerk
 District Court

DEC 22 2006

For The Northern Mariana Islands
 By _____
 (Deputy Clerk)

IN THE UNITED STATES DISTRICT COURT
 FOR THE
 COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

9
 10 In re ORDER TO SHOW CAUSE

CASE NO. CV 05-00019

11 LI YING HUA, ET AL.,

12 Plaintiffs,

MOTION FOR CONTINUANCE AND
 FOR SHORTENED TIME ON MOTION
 FOR CONTINUANCE

13 vs.

14 JUNG JIN CORPORATION, ET AL.,

15 Defendants.

Time:

Date:

Judge: Munson

17 On December 7, 2006, this Court issued an order called Amended Order in Aid of
 18 Judgment, which contained an Order to Show Cause why subject property listed in paragraph one
 19 (1) of the Order should not be sold by the U.S. Marshal free of liens and encumbrances. The
 20 Court set a hearing date of December 27, 2006.

21 In paragraph one (1) of the Order, the Court listed properties under subsection a, c, and d,
 22 in which Pil Sun Kim Kitami has a security interest. The Court issued the Order to Show Cause
 23 without any notice to Mrs. Kitami and without citation to any authority for such an order that
 24 could potentially extinguish her security interests. The bases for the Order are apparently a
 25 conclusionary declaration filed by Plaintiffs' counsel on or about November 28, 2006, par. 6, and a
 26 motion of November 9, 2006 at 6, in which the Plaintiffs assert a procedure for extinguishing
 27 liens, without any citation to authority for the truncated procedure.
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1 Ms. Kitami objects to the procedure and to the merits justifying an order to show cause.

2 As it were, Mrs. Kitami is not in a position to assert adequately her interest on the ordered
3 date of December 27, 2006, as her counsel is off-island in the continental United States, and she
4 has not had the opportunity to discover the basis for the Plaintiffs' position with respect to her
5 security interest except as the position is expressed in the declaration of Plaintiffs' counsel.

6 Mrs. Kitami has a material interest in the *res* in that the *res* secures a debt of approximately
7 \$300,000.00. This substantial amount should not be subject to arbitrary deprivation or hurried
8 procedure of which she had no notice and no opportunity to rebut adequately.

9 Therefore, Mrs. Kitami requests the Court continue the hearing until January 17, 2007 and
10 that she have until January 15, 2007, to file an appropriate memorandum. Her counsel returns to
11 the jurisdiction on January 3, 2007. Mrs. Kitami is not requesting an extravagant amount of time.
12 Two weeks to prepare is the time allotted by this Court to respond to a motion.

13 This motion is supported by a declaration of counsel. The motion should be decided on
14 shortened time.

15 Dated: December 21, 2006.

16 Respectfully submitted,

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20 /s/
21 Richard W. Pierce
22 Attorney for Pil Sun Kim Kitami
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